

EXHIBIT 3

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1 DISC
CHRISTOPHER J. HICKS
2 Washoe County District Attorney
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3 Deputy District Attorney
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(775) 337-5700

6 ATTORNEYS FOR WASHOE COUNTY

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 * * *

10 DREW RIBAR,

11 Plaintiff,

12 vs.

Case No. 3:24-cv-00526-ART-CLB

WASHOE COUNTY DEFENDANTS'
FIRST SUPPLEMENTAL
DISCLOSURES

13 WASHOE COUNTY, NEVADA;
14 WASHOE COUNTY LIBRARY SYSTEM;
15 BUILD OUR CENTER, INC.; JEFF
SCOTT; STACY MCKENZIE; JONNICA
16 BOWEN; LIBRARY EMPLOYEE DOE #1;
JENNIFER COLE; DEPUTY C. ROTHKIN
(BADGE #5696); DEPUTY R. SAPIDA
(BADGE #4663; SGT. GEORGE GOMEZ
17 (BADGE #4066); AND JOHN/JANE DOES
1-10,

18 Defendants.

19 _____/
20 Defendants Washoe County, Washoe County Library System, Jeff Scott, Stacy
21 McKenzie, Jonnica Bowen, Jennifer Cole, Deputy Rothkin, Deputy Sapida, Sergeant Gomez
22 (collectively "County Defendants"), by and through counsel, Michael W. Large, Deputy District
23 Attorney, hereby submit the following First Supplemental Disclosures pursuant to Fed.R.Civ.P.
24 26(e):

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1 6. Christopher Rothgeb, Deputy Sheriff
2 c/o Michael Large
3 One S. Sierra Street
4 Reno, NV 89501

5 Deputy Rothgeb is anticipated to testify regarding the facts and circumstances
6 underlying this dispute.

7 7. Richard Sapida, Deputy Sheriff
8 c/o Michael Large
9 One S. Sierra Street
10 Reno, NV 89501

11 Deputy Sapida is anticipated to testify regarding the facts and circumstances
12 underlying this dispute.

13 8. George Gomez, Sergeant
14 c/o Michael Large
15 One S. Sierra Street
16 Reno, NV 89501

17 Sergeant Gomez is anticipated to testify regarding the facts and circumstances
18 underlying this dispute.

19 9. Thanh Nguyen, Library Assistant II
20 c/o Michael Large
21 One S. Sierra Street
22 Reno, NV 89501

23 Ms. Nguyen is anticipated to testify regarding the facts and circumstances
24 underlying this dispute.

25 10. Jamie Hemingway, Public Information and Development Officer
26 c/o Michael Large
 One S. Sierra Street
 Reno, NV 89501

 11. Any and all witnesses named or called by Plaintiff.

 The aforementioned current and former Washoe County employees may testify regarding
their personal knowledge of the incidents giving rise to this case. Further, Defendants reserve the
right to list and identify additional witnesses whose names and addresses do not appear above,

1 but who are determined to have knowledge regarding the matters referred to in the pleadings as
2 discovery proceeds in this matter.

3 DOCUMENTS

4 Defendants disclose the following documents, copies of which are attached hereto and
5 bates-stamped:

6	WC0001-WC0003	Plaintiff's Human Resources Complaint
7	WC0004-WC006	Auditing Reno 911 YouTube page
8	WC0007	Auditing Reno 911 Cash App Link
9	WC0008-WC0142	Incident Reports and Suspension Documents
10	WC0143-WC0156	Library Board Meeting Minutes & Agenda Packets
11	WC0157-WC0158	Washoe County's Social Media Use Policy dated December 8, 2010
12	WC0159-WC0183	Emails
13	WC0184-WC0188	Photos
14	WC0189-WC0190	Patron Suspension Policy
15	WC0191-WC0192	Washoe County Social Media Policy
16	WC0193-WC0736	Emails to/from Plaintiff
17	WC0737-WC0765	Library Event Advertisements
18	WC0766-WC0767	Photos of 2023-2024 Rainbow Fest Signs
19	WC0768-WC0769	Library Policy - Programs and Presenters
20	WC0778-WC0779	Police Call Log – November 12, 2024
21	WC0780-WC0791	Social Media Posts

22 MEDIA

23	WC0770	Auditing Reno 911 YouTube video – “911 Call from Fearful
24		Librarian”

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. I certify that on this date, I deposited for mailing in the U.S. Mails, with postage fully prepaid, a true and correct copy of the foregoing document in an envelope addressed to the following:

Drew Ribar
3480 Pershing Lane
Washoe Valley, NV 89704
Pro se litigant

Jerry C. Carter, Esq.
Alison R. Kertis, Esq.
Sierra Crest Business Law Group
6770 S. McCarran Blvd, First Floor
Reno, NV 89509

Dated this 3rd day of January, 2025.

/s/S. Larkin
S. Larkin